

December 13, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

RE: MB Docket No 05-311 In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992

I am writing in support of the Comments of the Cable Act Preservation Alliance (“CAPA”) in the Second Further Notice of Proposed Rule Making. I oppose the tentative conclusions the FCC reaches in the proceeding because of their impacts on our community.

I appreciate and greatly value the Grand Rapids Community Media Center (GRCMC). The GRCMC provides a multitude of media resources for the West Michigan community, all of which are available to area residents and organizations on a non-discriminatory and intentionally inclusive basis. The work of the GRCMC ensures that a diverse array of individuals and partner organizations can use and participate in building community through all of GRCMC's media platforms, tools, education opportunities and resources. It introduces local audiences to new voices and ideas on stage, screen and over the air. Our Community Media Center enhances community engagement and creates local connections.

This local presence encourages viewers in Grand Rapids, Michigan to watch cable television as was intended by the 1984 Cable Act – by enhancing local voices, serving local viewers and strengthening our local democracy. By defining “in-kind” support in an overly broad fashion, the rule making will shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels which was never the intent of the Act.

By allowing cable operators to reduce franchise fee support for local communities if they opt for local channels, the FNPRM diminishes the ability of PEG channels to serve communities such as ours. I ask that it not be adopted. The Commission should abandon the Second FNPRM’s proposal to treat cable-related nonmonetary franchise requirements as a franchise fee. It also should abandon its proposal to modify and expand the “mixed-use” rule.

Sincerely,
Travis J. Scott, CTS